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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

CARLIE SHERMAN, ANNA GOZUN,
 AMANDA NASH, and JOHN DOE, on behalf
 Of themselves and all similarly situated persons,

Plaintiffs,

v.

Civil Action No.: 20-cv-00215

TRINITY TEEN SOLUTIONS, INC., a Wyoming
 corporation; TRIANGLE CROSS RANCH, LLC,
 a Wyoming limited liability corporation; MONKS
 OF THE MOST BLESSED VIRGIN MARY OF
 MOUNT CARMEL, d/b/a MYSTIC MONK
 COFFEE, a Wyoming Corporation; GERALD E.
 SCHNEIDER; MICHAEELEEN P. SCHNEIDER;
 ANGELA C. WOODWARD; JERRY D.
 WOODWARD; DANIEL SCHNEIDER;
 MATHEW SCHNEIDER; MARK SCHNEIDER;
 KARA WOODWARD; KYLE WOODWARD;
 THOMAS GEORGE; JUDITH D. JEFFERIS;
 DALLY-UP, LLC, a Wyoming limited liability
 corporation; ROCK CREEK RANCH, INC., a
 Delaware corporation; DIOCESE OF CHEYENNE,
 a Wyoming corporation; the SOCIETY OF OUR
 LADY OF THE MOST HOLY TRINITY, a
 Texas corporation; and NEW MOUNT CARMEL
 FOUNDATION, INC., a Wyoming corporation,

Defendants.

DEFENDANT NEW MOUNT CARMEL FOUNDATION, INC.'S MOTION TO DISMISS

Defendant New Mount Carmel Foundation, Inc. (hereinafter "Foundation"), through their attorneys Schwartz, Bon, Walker & Studer, LLC, and Patterson Buchanan Fobes & Leitch, Inc., P.S., hereby moves under Federal Rule of Civil Procedure 12(b)(6) to dismiss the claims of Plaintiffs against the Foundation for failure to state a claim upon which relief may be granted. The Foundation has submitted its supporting Brief contemporaneously with this Motion. For the foregoing reasons and those reasons contained in the supporting Brief, the Foundation respectfully requests that the Court dismiss Plaintiffs' claims against the Foundation, with prejudice.

DATED this 21st day of January, 2021.

SCHWARTZ, BON, WALKER & STUDER,
LLC

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CERTIFICATE OF SERVICE

This is to certify that on this 21st day of January, 2021, I served a true and correct copy of the above and foregoing document via the CM/ECF addressed as follows:

<p>Attorneys for Plaintiffs: Michael Rosenthal (mike@hkwyolaw.com) Nathan Nicholas (nnicholas@hkwyolaw.com) Hathaway & Kunz, LLP PO Box 1208 Cheyenne, WY 82003-1208</p> <p>Brice Timmons (brice@donatilaw.com) Bryce Ashby (bryce@donatilaw.com) Craig Edgington (craig@donatilaw.com) Donati Law, PLLC 1545 Union Ave. Memphis, TN 38104</p> <p>Frank Watson, III (fwatson@watsonburns.com) Watson Burns, PLLC 253 Adams Ave. Memphis, TN 38104</p>	<p>Attorneys for Defendants Trinity Teen Solutions, Inc, Jerry Woodward, Kara Woodward, Kyle Woodard, Dally-Up, LLC: Thomas Quinn (tquinn@gordonrees.com) Lillian Alves (lalves@grsm.com) Gordon & Rees, LLP 555 Seventeenth St., Ste. 3400 Denver, CO 80202</p>
<p>Attorneys for Defendants Triangle Cross Ranch LLC, Gerald Schneider, Michaelen Schneider. Matthew Schneider, Mark Schneider, and Thomas George: Keith R. Olivera (kolivera@wsteele.com) Monty L. Barnett (mbarnett@wsteele.com) Rachel E. Ryckman (rryckman@wsteele.com) White & Steele, PC 600 17th St., Ste. 600N Denver, CO 80202</p>	<p>Attorneys for Defendants Monks of the Most Blessed Virgin Mary of Mount Carmel, and Daniel Schneider: Traci Lacock (tlacock@hirstapplegate.com) Hirst Applegate, LLC 1720 Carey Ave., Suite 400 Cheyenne, WY 82003</p>
<p>Attorney for Defendants Rock Creek Ranch Inc, and Judith Jefferis: Timothy Stubson (tstubson@crowleyfleck.com) Crowley Fleck PLLP 111 West Second Street, Suite 220 Casper, WY 82601</p>	<p>Attorneys for Defendant Diocese of Cheyenne: Paul Hickey (phickey@hickeyevans.com) Loyd Smith (lsmith@hickeyevans.com) Hickey & Evans, LLP PO Box 467 Cheyenne, WY 82003-0467</p>
<p>Attorneys for Defendant Society of Our Lady of the Most Holy Trinity: Jane M. France (jfrance@spkm.org) Sundahl Powers Kapp & Martin</p>	<p>Attorney for Defendant New Mount Carmel Foundation, Inc.: Rick Koehmstedt (rick@schwartzbon.com) 141 S. Center St., Suite 500</p>

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/s/Jennifer Friesen

Jennifer Friesen, Legal Assistant